

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION – IN ADMIRALTY

Penny Jo Barnett, individually and as Personal  
Representative of the Estate of Edward Barnett,

Plaintiff,

vs.

United States of America,

Defendant.

Case Number: 2:20-cv-02517-DCN

**Consent Motion to Amend  
Second Amended Scheduling  
Order**

Pursuant to Local Civil Rule 6.01, Plaintiff hereby moves for an extension of the deadlines to identify testifying expert witnesses set forth in the Second Consent Amended Scheduling Order (ECF 36) entered by the Court on March 18, 2021 in the above-entitled action. To date, the parties have diligently engaged in discovery via the production of various documents and materials and the identification of fact witnesses. Plaintiff has met and conferred with Defendant who consents to this motion. As such, the parties hereby request modification of the following deadlines in the action:

1. The parties propose that the current deadline of May 18, 2021 for Plaintiff to identify testifying expert witnesses be extended to May 28, 2021.
2. The parties propose that the current deadline of June 16, 2021 for Defendant to identify testifying expert witnesses be extended to June 25, 2021.

The remaining deadlines in the Second Consent Amended Scheduling Order are unaffected.

WHEREFORE, the parties respectfully request that this Honorable Court grant this

Motion to amend the deadlines in the manner set forth above and in the Third Amended Scheduling Order submitted to this Court.

**WE SO MOVE:**

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May 13, 2021.

**WE SO CONSENT:**

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May 13, 2021.